

Federal Defenders  
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January 27, 2025

The request for an adjournment is GRANTED. The conference will now take place on Thursday, February 13, 2025, at 3:00 PM. IT IS FURTHER ORDERED that the time between January 30, 2025, and February 13, 2025, be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Court finds that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial, because it will provide the parties with time needed to discuss a potential pretrial resolution of the case. The Clerk of Court is respectfully directed to terminate the motion at Dkt. 40.

**BY ECF**

Honorable Arun Subramanian  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Virginia Lemus Recinos  
23 Cr. 464 (AS)**

Dear Judge Subramanian:

I write to request a two-week adjournment of the status conference currently scheduled for January 30, 2025. The government has extended a plea offer to Ms. Lemus Recinos that she is in the process of considering. Given the complexity of the collateral consequences associated with the government's plea offer, and consistent with Ms. Lemus Recinos' Sixth Amendment rights under *Padilla v. Kentucky*, 599 U.S. 356 (2010), I request additional time to advise Ms. Lemus Recinos about the government's offer. This is the ninth joint or unopposed request for an adjournment. The past requests were granted to allow the defense to prepare its deferred prosecution submission, for new defense counsel to familiarize herself with the case, and for the government to consider the defendant's request and subsequent appeals. The parties apologize to the Court for the large number of adjournments in this case but are conferring in good faith with the aim of resolving this case short of trial.

Finally, the government seeks, and the defense consents to, the exclusion of time under the Speedy Trial Act until the date of the next conference.

Respectfully submitted,

/s/

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CC: Counsel of Record